

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**PLAINTIFF'S RESPONSE TO DEFENDANT'S FOURTH
SET OF INTERROGATORIES**

Plaintiff, Joseph Mantha hereby responds, pursuant to Fed. R. Civ. P. 33, to the Defendant's Fourth Set of Interrogatories.

INTERROGATORIES

36. Identify and provide a list of names of employees, independent contractors, and/or agents of Dr. Franklin Perkins School who had access to your cell phone number or called your cell phone number in 2019, or whom you called from your cell phone number in 2019, including in your answer their names, positions of employment relative to Dr. Franklin Perkins School, and any number from which they may have called or did call your cell phone number in 2019, or the number(s) you called in 2019, including their business and personal numbers.

OBJECTION: Plaintiff objects to this interrogatory as it is far in excess of the number (25) of interrogatories permitted by Local Rule 26.1, without leave of court. Plaintiff objects to this interrogatory as it is overbroad, compound, oppressive and not proportionate to the needs of this case. Answering further, Defendant has questioned Plaintiff in detail as to these

issues at his deposition. Subject to this objection and answering further, Plaintiff will provide a document that lists his direct reports under his supervision as agreed at his deposition.

37. Identify the telephone numbers used for the “on call” system at Dr. Franklin Perkins School in 2019.

OBJECTION: Plaintiff objects to this interrogatory as it is far in excess of the number (25) of interrogatories permitted by Local Rule 26.1, without leave of court. Subject to this objection and answering further, Plaintiff will provide a document that lists the telephone numbers used for the “on call” system in 2019.

As to objections,

PLAINTIFF,
By his attorneys

/s/ Matthew P. McCue
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CERTIFICATE OF SERVICE

I, hereby certify that on October 13, 2020, I served the foregoing via e-mail to counsel of record.

/s/ Matthew P. McCue
Matthew P. McCue